

RECEIVED
U.S. DEPARTMENT
OF JUSTICE
CRIMINAL DIVISION

AUG 31 2 42 PM '81

NOT RECORDED

UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20530

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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Not Applicable

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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? ☐ Yes ☒ No

If yes, identify each such person and describe his services.

Not Applicable

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6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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Not Applicable

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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? ☐ Yes ☒ No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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Not Applicable

II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name of foreign principal

Date of Termination

Not Applicable

-
9. Have you acquired any new foreign principal¹ during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish following information:

Name and address of foreign principal

Date acquired

Not Applicable

-
10. In addition to those named in Items 8 and 9, if any, list the foreign principals¹ whom you continued to represent during the 6 month reporting period.

Glenrothes Development Corporation

Netherlands Antilles Economic Mission

Newfoundland Department of Industrail Development

Trinidad & Tobago IDC

UNIDO-United Nations Industrial Development Organization

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Glenrothes Development Corporation-Publicized & informed U.S. business men about opportunities in Scotland via press releases and mailings.

Netherlands Antilles-Publicized & informed U.S. businessmen about opportunities in NA via ADS & Press releases.

Newfoundland-Publicized & informed U.S. businessmen about opportunities in Newfoundland via releases.

Trinidad & Tobago-Provided consulting assistance only to the client with special reference to developing an opinion poll in Canada & possibly the U.S. of executive additudes toward Trinidad & Tobago in the perspective of the Carribean.

UNIDO-Consulting services in connection with developing draft report, development of audio/visual slide presentations, estimates & development of brochures & folders for various nations.

¹The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity² as defined below?

Yes ☒ No ☒

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Not Applicable

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

Not Applicable

² The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.³

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
(See attached listing of Receipts of monies from Foreign Principals)			

Total

14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value⁴ other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
Not Applicable			

³ A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

⁴ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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(See attached listing of Cash Disbursements of monies for Foreign Principals)

Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value⁵ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
Not Applicable				

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value⁵ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
Not Applicable			

V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Glenrothes
Netherlands Antilles
Newfoundland

⁵ Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?

Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

Not Applicable

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☒ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams
☒ Advertising campaigns ☒ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches

☐ Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials ☒ Newspapers ☐ Libraries
☐ Legislators ☒ Editors ☐ Educational institutions
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups

☐ Other (Specify) Area Development Publications

21. What language was used in this political propaganda:

☒ English

☐ Other (specify) _____

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

VI - EXHIBITS AND ATTACHMENTS

25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A⁶ Yes ☒ No ☐

Exhibit B⁷ Yes ☒ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☒

If no, please attach the required amendment.

⁶ The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

⁷ The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

26. EXHIBIT C

If you have previously filed an Exhibit C⁸, state whether any changes therein have occurred during this 6-month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☒
Not Applicable

If no, please attach the required amendment.
Not Applicable

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

Not Applicable

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Ted M. Levine

Ted M. Levine-President

Emanuel T. Ellenis

Emanuel T. Ellenis-Vice President

Subscribed and sworn to before me at Citibank, NYC

this 28th day of AUGUST, 19 81

JOANNE TULLO
Notary Public, State of New York
No. 4781517
Qualified in Kings County
Commission Expires March 30, 1983

Joanne Tullo
(Signature of notary or other officer)

⁸ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

Client: Glenches

U.S. Department of Justice Report

1/30/81 to 7/29/81

Development Counsellors Int'l Inc.

733 Third Avenue-Suite 2100

NYC, N.Y. 10017 212-687-1383

				Less			Total
				Foreign			DCI-Cash
				Exchange			Disbursed
Date	Details	Fee	Expenses	Loss:	Total	Receipts	
2 4	10/30/80	2750 00	3233 83			5983 83	
2	10 1 20/81		652 50			652 50	
3	3 2 1 31/81	2750 00	250 00			3000 00	
4	16 2 28/81	2750 00	250 00			3000 00	
5	5 26 3 31/81	302 500	275 00				
6	4 30/81	302 500	275 00			6600 00	
7	6 3 5 31/81	302 500	275 00			3300 00	
8	7 27 6 30/81	302 500	275 00				
				TOTAL		25836 33	
11	3 18 Media Distribution - Release						11036
12	6 P. Levine - Expenses						126 00
13	27 M. Brown - Expenses						1475
14	27 P. Levine - Expenses						76 22
15	4 23 E.T. Ellison - Expenses						2955
16	29 T. McQuinn - Amer. Express - Expenses						17310
17	5 20 T.M. Leoni - Expenses						2180
18	29 Sem Candor Distrib's Assoc - Publication						4000
19	7 24 Semi - Publication						5000
20						TOTAL	64178

Client: Neonias Hntiles Development Counsellors Int'l Inc.
 U.S. Department of Justice Report 733 Third Avenue-Suite 2100
 NYC, N.Y. 10017 212-687-1383
1/30/81 to 7/29/81

Date	Details	Fee	Expenses	Less Foreign Exchange Loss:	Total Receipts	Total DCI-Cash Disbursed
2.20	1/31/81	75000			75000	
4.8	2/28/81	75000			75000	
21	3/31/81	75000			75000	
5.18	4/30/81	75000			75000	
7.14	6/16/81	75000	75500		75500	
27	5/31/81	75000			75000	
	6/30/81					
				TOTAL	525500	

2.12	Associated Messenger					470
12	Archer Messenger					940
27	E.T. Elenis - Expense					3520
3.17	Associated Messenger					1440
17	Jack Dobson - Consultant					10000
31	Associated Messenger					520
4.14	Jack Dobson - Consultant					222.24
23	E.T. Elenis - Expense					8335
6.19	Area Development - Expense					641.75
7.24	E.T. Elenis - Expense					3035
						<u>1144.59</u>

Client: Newfoundland
U.S. Department of Justice Report
1/30/81 to 7/29/81

Development Counsellors Int'l 1
733 Third Avenue Suite 2100
NYC, N.Y. 10017 212-687-1383

		Date	Details	Fee	Expenses	Less Foreign Exchange Loss:	Total Receipts	Total DCI-Cash Disburse
1	2	4	11/31/80	416666		73625	343041	
2	2	18	12/31/80		263426		263426	
3	4	6	1/31/81	416666		72458	344209	
4	5	4	2/28/81	416666		76292	340374	
5		26	3/31/81	416666		76000	340666	
6								
7								
8						TOTAL	1631715	
9								
10								
11	2	12	Associated Messenger					3050
12		13	Media Distribution - Release					38613
13		13	The Battery - Hotel Travel Exp.					25357
14	3	18	Media Distribution - Release					6367
15		17	Archer Messenger					400
16		17	The Battery - Hotel Travel Exp. (add postage meter)					1201
17		17	Jack Dobson - Consultant					10000
18	3	13	E.T. Elenis - Expenses					3590
19		18	Evening Telegram - Subscription					3109
20		27	Media Distribution - Release					8832
21		31	Associated Messenger					1750
22	4	14	Jack Dobson - Consultant					5556
23		23	E.T. Elenis - Expenses					3045
24		23	I. Cohen - Expenses					1940
25		23	Media Distribution - Release					33614
26		30	E.T. Elenis - Expenses					4625
27	5	13	Jack Dobson - Consultant					10000
28		13	E.T. Elenis - Trip Advance					20000
29		20	Action Computer - Mailgrams					5650
30		20	Brad Printing - Invitations					156165
31		20	Copland Catering - Trip Travel Expense					91566
32		20	Houston Post - Clip from Paper					100
33		20	T.M. Leune - Expenses					3400
34		20	Media Distribution - Release					23984
35		20	ET Elenis - Expenses					24401
36		28	I. Cohen - Expenses					4290
37		28	ET Elenis - Expenses					2115
38	6	10	Wardorf Astoria - Deposit for luncheon					25000
39		22	Hopkins - Photo Reproduction					2592
40		22	Emily Photographs - Photo Reproduction					2484
		26	I. Cohen - Expenses					2435
12	6	26	E.T. Elenis - Expenses					31235
13		26	Western Union - Mailgram					35119
14		26	Evening Telegram - Subscription					11239
15	7	14	I. Cohen - Expenses					3960
16		24	Chase Dist Mail - Mailings					14886
17		24	Caray Cadillac - Car Rental					15095
18		15	Jack Dobson - Consultant					16667
19		24	Media Distribution - Release					9465
20		24	PR Newswire - Wire Service					14000
21		24	Radio TV Rights - Copy Service					2660
22		24	Wide World Photo - Photographs					9100
23		24	ET Elenis - Expenses					7035
24		30	I. Cohen - Expenses					3795
25								699327

Client: Trinidad + Tobago

Development Counsellors Int'l. Inc.

U.S. Department of Justice Report

733 Third Avenue-Suite 2100

NYC, N.Y. 10017 212-687-1383

1/30/81 to 7/29/81

Date	Details	Fee	Expenses	Less Foreign Exchange Loss:	Total Receipts	Total DCI-Cash Disbursed
2 26	1/31/81	420000	5195		425195	
3 20	2/28/81	420000			420000	
3 5 1	3/31/81	420000	309661		729661	
4 18	4/30/81	420000	304416		724416	
5 7 14	5/31/81	420000	12650		432650	
				TOTAL	2731922	
2 12	Associated Messenger					940
12 13	Ted M Levine Travel Exp.					570
13 15	Saddle Creek Studios Art/Creative Time					4000
14 3 17	F. Knight Expenses					1760
15 13	E. T. Ellens Expenses					191.27
16 27	M. Brown Expenses					2340
17 31	Associated Messenger					520
31	Ted M Levine Expenses					2300
19 4 28	American Express - T. Levine - Expenses					2220
20 28	T. M. Levine Expenses					2930
21 28	PennFlor Corp. Storage					4725
22 6 28	Dan Jones - W. Journal Ad					258753
23 20	Dan Jones - W. Journal Ad					258753
24 28	American Express - T.M. Expenses					15413
25 28	T. M. Levine Expenses					2100
26 6 5	M. Brown Expenses					2415
27 22	Hotel + Motel Mgmt - Publication					12650
28 7 24	Associated Messenger					4600
29 24	PennFlor Corp. Storage					4725
						<u>600841</u>

RECEIVED
U.S. DEPARTMENT
OF JUSTICE
CRIMINAL DIVISION

AUG 31 2 42 PM '81
INTERNAL SECURITY
SECTION
REGISTRATION UNIT

UNITED STATES DEPARTMENT OF JUSTICE
REGISTRATION UNIT
CRIMINAL DIVISION
WASHINGTON, D. C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes XXX or No _____

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes _____ or No _____

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

x Ted M. Levine
Signature

August 28, 1981
Date

Ted M. Levine
Please type or print name of
signatory on the line above

President
Title